

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Zohar III, Corp., *et al.*,<sup>1</sup>

Debtors.

ZOHAR CDO 2003-1, LIMITED; ZOHAR II  
2005-1, LIMITED; and ZOHAR III, LIMITED,

Plaintiffs,

-against-

PATRIARCH PARTNERS, LLC;  
PATRIARCH PARTNERS VIII, LLC;  
PATRIARCH PARTNERS XIV, LLC;  
PATRIARCH PARTNERS XV, LLC;  
PHOENIX VIII, LLC; OCTALUNA LLC;  
OCTALUNA II LLC; OCTALUNA III LLC;  
ARK II CLO 2001-1, LLC; ARK  
INVESTMENT PARTNERS II, LP; ARK  
ANGELS VII, LLC; PATRIARCH PARTNERS  
MANAGEMENT GROUP, LLC; PATRIARCH  
PARTNERS AGENCY SERVICES, LLC; and  
LYNN TILTON,

Defendants.

Chapter 11

Case No. 18-10512 (KBO)

Jointly Administered

Adversary No. 20-50534 (KBO)

**Related to Adv. Docket Nos. 125, 131, 132, 135,  
137, 138, 140, and 144**

**NOTICE OF COMPLETION OF BRIEFING**

**PLEASE TAKE NOTICE** that briefing on the Defendants' Motion to Dismiss and Defendants' Motion to Strike Certain Material from the Amended Complaint [Adv. Docket No. 131] (the "Motion") filed by defendants Patriarch Partners, LLC; Patriarch Partners VIII, LLC; Patriarch Partners XIV, LLC; Patriarch Partners XV, LLC; Phoenix VIII, LLC; Octaluna LLC; Octaluna II LLC; Octaluna III LLC; Ark II CLO 2001-1, LLC; Ark Investment Partners II, LP; Ark Angels VII, LLC; Patriarch Partners Management Group, LLC; Patriarch Partners Agency Services, LLC; and Lynn Tilton (collectively, the "Defendants") is complete. The following are all pleadings relevant to the Motion:

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<sup>1</sup> The "Debtors," and, where applicable, the last four digits of their taxpayer identification number are as follows: Zohar III, Corp. (9612), Zohar II 2005-1, Corp. (4059), Zohar CDO 2003-1, Corp. (3724), Zohar III, Limited ("Zohar III") (9261), Zohar II 2005-1, Limited ("Zohar II") (8297), and Zohar CDO 2003-1, Limited (together with Zohar II and Zohar III, the "Zohar Funds") (5119). The Debtors' address is 3 Times Square, c/o FTI Consulting, Inc., New York, NY 10036.

1. [Sealed] First Amended Complaint (Filed September 1, 2021) [Adv. Docket No. 125];
2. [Sealed] Defendants' Motion to Dismiss and Defendants' Motion to Strike Certain Material from the Amended Complaint (Filed October 15, 2021) [Adv. Docket No. 131];
3. [Sealed] Declaration of Theresa Trzaskoma in Support of Defendants' Motion to Dismiss and Defendants' Motion to Strike Certain Material from the Amended Complaint (Filed October 15, 2021) [Adv. Docket No. 132];
4. Order Approving Stipulation Regarding Scheduling (Entered October 25, 2021) [Adv. Docket No. 135];
5. [Sealed] Zohar Funds' Brief in Opposition to Defendants' Motion to Dismiss and Defendants' Motion to Strike Certain Material from the Amended Complaint (Filed November 24, 2021) [Adv. Docket No. 137];
6. Declaration of Ryan Bartley in Support of Zohar Funds' Brief in Opposition to Defendants' Motion to Dismiss and Defendants' Motion to Strike Certain Material from the Amended Complaint (Filed November 24, 2021) [Adv. Docket No. 138];
7. Notice of Filing of Proposed Redacted Version of Zohar Funds' Brief in Opposition to Defendants' Motion to Dismiss and Defendants' Motion to Strike Certain Material from the Amended Complaint (Filed December 6, 2021) [Adv. Docket No. 140]; and
8. [Sealed] Reply in Further Support of Defendants' Motion to Dismiss and Defendants' Motion to Strike Certain Material from the Amended Complaint (Filed December 23, 2021) [Adv. Docket No. 144].

Dated: December 27, 2021

**COLE SCHOTZ P.C.**

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